Exhibit G

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1
             IN THE UNITED STATES DISTRICT COURT
 2
         FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
                     CHARLESTON DIVISION
 4
 5
      IN RE: ETHICON, INC. : MDL NO. 2327
 6
      PELVIC REPAIR SYSTEM,
      PRODUCTS LIABILITY
      LITIGATION
 8
 9
           AND VARIOUS OTHER CROSS-NOTICED ACTIONS
          CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER
10
11
                      December 23, 2014
12
13
14
                    Videotaped deposition of KATRIN
    ELBERT, Ph.D. taken pursuant to notice, was held
15
    at the law offices of Riker Danzig Scherer Hyland &
    Perretti LLP, Headquarters Plaza, One Speedwell
16
    Avenue, Morristown, New Jersey, beginning at 8:58 a.m.,
    on the above date, before Ann Marie Mitchell, a
17
    Federally Approved Certified Realtime Reporter,
    Registered Diplomate Reporter and Notary Public for
18
     the State of New Jersey.
19
20
21
                  GOLKOW TECHNOLOGIES, INC.
               877.370.3377 ph | 917.951.5672 fax
22
                        deps@golkow.com
23
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25
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- 1 Q. And you would have had a design
- 2 review meeting like that after each one of the
- 3 stages set forth in appendix IV of PR 364?
- 4 A. Yes.
- 5 Q. Now, what is a design history file?
- 6 A. So the design history file is the --
- 7 it's the archive of all the documents that show us
- 8 the history of the design of the product. It
- 9 contains all of our design control documents, and
- it's also what we use to support regulatory
- 11 submissions.
- 12 Q. And as the project leader, do you
- 13 have a specific responsibility regarding the design
- 14 history file?
- 15 A. Yes. In the end, I have the ultimate
- 16 responsibility that all the required documents are
- 17 collected in the DHF, the design history file.
- 18 Q. Is it one of your jobs is to make
- 19 sure everything that's supposed to be in the DHF
- 20 gets put in the DHF?
- 21 A. Yes, that's one of my jobs.
- 22 O. And did you do that for TVT ABBREVO?
- 23 A. Yes, I do.
- Q. And are the three-ring binders that
- are behind your left shoulder, is that a printout of